## UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

BEN VEAL,	)
Plaintiff,	)
v.	) Civil Action No.: 14-cv-05810
RUBBERMAID COMMERCIAL PRODUCTS, LLC,	) Hon. Judge Rebecca R. Pallmeyer )
Defendant.	

## AGREED MOTION FOR ENTRY OF STIPULATED PROTECTIVE ORDER

Pursuant to Federal Rule of Civil Procedure 26(c), Plaintiff Ben Veal and Defendant Rubbermaid Commercial Products, LLC submit the attached Stipulated Protective Order for the approval of the Court.

The parties wish to limit disclosure of confidential technical, financial and other business information that may be disclosed during discovery in this action. The Stipulated Protective Order has been executed by the parties by their respective counsel and is hereby submitted for review and approval by the Court for use in connection with the above-captioned proceeding.

WHEREFORE, Defendant respectfully requests that the Court grant this Agreed Motion for Entry of the Stipulated Protective Order, submitted to the court by e-mail to <a href="mailto:Proposed Order Pallmeyer@ilnd.uscourts.gov">Proposed Order Pallmeyer@ilnd.uscourts.gov</a> according to the Court's Case Management Procedures and that said Stipulated Protective Order be entered by the Court.

Dated: July 9, 2015

/s/ Tiffany D. Gehrke

Mark H. Izraelewicz

Andrew M. Lawrence

Tiffany D. Gehrke

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Counsel for Defendant

RUBBERMAID COMMERCIAL PRODUCTS, LLC

## CERTIFICATE OF SERVICE

I, Tiffany D. Gehrke, an attorney, hereby certify that on July 9, 2015, I caused a copy of the foregoing to be served via ECF upon all counsel of record.

/s/ Tiffany D. Gehrke